Case 1:21-cv-05577-NRB Document 73 Filed 10/03/23 Page 1 of 1

WALDEN MACHT &HARANLLP

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T: 212-335-2030 F: 212-335-2040

September 8, 2023

Via ECF

Honorable Naomi Reice Buchwald United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 ENDORSENT

Application devised as most

Cequel Communications, LLC v. MOX Networks, LLC, No. 21-CV-5577

WEDT

Dear Judge Buchwald:

Re:

Plaintiff Cequel Communications, LLC ("Cequel") submits this letter, pursuant to Section 6 of ECF Rules & Instructions and Your Honor's Individual Practices Rule 2(H), to respectfully request sealing and redacted treatment of the below exhibits to the Declaration of Avni P. Patel, filed with Cequel's Motion for Summary Judgment. The reason for the requested treatment is Defendant MOX Networks, LLC ("MOX") has informed undersigned counsel that MOX intends to apply to seal and/or redact the below documents. The Court should allow these exhibits to be filed temporarily under seal and/or redacted to allow MOX time to submit its application.

Document	Request
Exhibit 51 (MOX0077416)	Redactions
Exhibit 79 (MOX0043168)	Redactions
Exhibit 77 (MOX0077397)	Redactions
Exhibit 78 (COMCASTCEQUEL00000852)	Redactions
Exhibit 34 (COMCASTCEQUEL00000028)	Sealed
Exhibit 35 (COMCASTCEQUEL00000017)	Sealed

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ Avni P. Patel

Avni P. Patel

cc: All counsel of record (via ECF)